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12 *Valley Health System, LLC,*
13 *d/b/a Centennial Hills Hospital Medical Center*

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

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11 AMY VILELA, an individual;
12 JOZETTE FIGUEREDO, an individual;
13 AMY VILELA, as Special Administrator of the
14 Estate of SHALYNNE RAMOS,
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16 vs.
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AMY VILELA, an individual;
JOZETTE FIGUEREDO, an individual;
AMY VILELA, as Special Administrator of the
Estate of SHALYNNE RAMOS,

vs.

VALLEY HEALTH SYSTEM, LLC, d/b/a
CENTENNIAL HILLS HOSPITAL
MEDICAL CENTER, a Nevada Limited Liability
Company; UNIVERSAL HEALTH SERVICES
OF DELAWARE, INC., a Delaware corporation;
VALLEY HOSPITAL MEDICAL CENER, INC.,
a Nevada Corporation, EMCARE, INC., a
Delaware Corporation; TANYA NETZ PAC; JILL
MCATEE, RN; DOE DEFENDANTS I through
X, inclusive; ROE NURSES I through XX,
inclusive; ZOE HOSPITALS or OTHER
MEDICAL FACILITIES I through X; and ROE
CORPORATIONS I through X, inclusive,

Defendants.

CASE NO.: 2:16-cv-01503-RFB-CVH

**STIPULATION AND PROPOSED
ORDER EXTENDING TIME TO
FILE REPLY IN SUPPORT OF
MOTION TO DISMISS (FIRST
REQUEST)**

Plaintiffs Amy Vilela (“Viela”), Jozette Figueredo (“Figueredo”), Amy Vilela as the
Special Administrator of the Estate of Shalynne Ramos (the “Ramos Estate”) (collectively

1 "Plaintiffs"); Defendant Valley Health System, LLC, d/b/a Centennial Hills Hospital Medical
 2 Center ("Valley Health"); and Defendant Tanya Netz, PAC, ("Netz") hereby stipulate as follows:
 3 (1) The due date for Valley Health's Reply in Support of its Motion to Dismiss (Doc
 4 #14) is currently October 27, 2016.
 5 (2) The parties agree that the due date for the Reply should be extended to November 3,
 6 2016.
 7 (3) Counsel for Valley Health is currently working on over twenty reply briefs in support
 8 of motions *in limine* for a case with a firm trial date. A one-week extension is
 9 therefore needed to complete the Reply in this matter.
 10 (4) No parties will be prejudiced by the contemplated extension. Discovery has not yet
 11 begun, and no trial date is set in this matter.

12 IT IS SO STIPULATED:

13 DATED this 27th day of October, 2016.
 14 HALL PRANGLE & SCHOONVELD, LLC
 15
 16 /s/: Ryan T. O'Malley
 CASEY W. TYLER, ESQ.
 Nevada Bar No.: 9706
 17 RYAN T. O'MALLEY, ESQ.
 Nevada Bar No.: 12461
 18 1160 N. Town Center Dr., Ste. 200
 Las Vegas, NV 89144
 19 *Attorneys for Defendants Valley Health*
System, LLC, d/b/a Centennial Hills Hospital
Medical Center

13 DATED this 27th day of October, 2016.
 14 LAW OFFICES OF CASEY D. GISH
 15
 16 /s/: Casey D. Gish
 CASEY D. GISH, ESQ.
 Nevada Bar No.: 6657
 17 5940 South Rainbow Road
 Las Vegas, NV 89118
Attorneys for Plaintiffs

21 DATED this 27th day of October, 2016.
 22 JOHN H. COTTON & ASSOCIATES
 23
 24 /s/: Todd Weiss
 TODD WEISS, ESQ.
 Nevada Bar No.: 14130
 25 7900 W. Sahara Ave., #200
 Las Vegas, NV 89117
 26 *Attorneys for Defendant Tanya Netz, PAC*

Amy Vilela, et al. vs. Valley Health System, LLC, et al.

Case No.: 2:16-cv-01503-RFB-CVH

ORDER

Pursuant to the terms of the attached stipulation, the Court orders as follows:

1. Good cause exists for extension of the due date for Valley Health Systems, LLC's Reply in Support of its Motion to Dismiss (Doc. #14).
 2. The due date for the Reply is extended to November 3, 2016.

Respectfully Submitted:

HALL PRANGLE & SCHOONVELD, LLC

RICHARD F. BOULWARE, II

United States District Judge

DATED this 3rd day of November, 2016.

/s/: Ryan T. O'Malley

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